

MMM Committee Comments Pertaining to ACE Development Priorities  
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The MMM Committee recommends the funding of those GIFs supporting the following seven functionalities – as part of the core deliverables of ACE.

1. Imaging: Recommend the inclusion of imaging capability beyond that already planned for inclusion in the ACE ABI functions.
  - a. The Committee supports the imaging functionality scheduled for delivery in ACE for ABI.
  - b. The volume, urgency, and of paper communication outside of ABI functions justifies development of imaging to facilitate “transportation.
  - c. Recommend the development of imaging technology to support the delivery of transportation-related documents.
2. Diversion of Manifest: Implement the ability to divert, en masse and as required by ‘acts of God’ such as volcanic eruptions, floods, and hurricanes, all cargo on a conveyance from the intended port of arrival to an alternate port of arrival.
  - a. The ability to divert with one operation all cargo on a conveyance is more efficient than manually keying in diversion information for every bill being transported by a diverted conveyance.
  - b. The need to divert conveyance is, by number of cases, estimated to be in the following order;
    - i. Air
    - ii. Rail
    - iii. Ocean
    - iv. Truck
3. Automated Export Manifest: The Committee supports the automation of this mandatory reporting which is currently 100% paper based.
  - a. Recommend development of an automated ocean/rail export manifest to mirror that which is currently in production with regard to the automated import manifest, while retaining the current export manifest filing time frames.
  - b. Support the Export Committee’s GIFs, especially # 940, insofar as they are understood as above.
4. In-Bond:
  - a. Because of Customs’ relatively recent prioritization of this subject we have convened an In-Bond Task Group which is working on development issues with Customs.

- b. We support the full automation of in-bond processes to include;
      - i. the 30 day maximum for in-bond transit times across all modes,
      - ii. automatic 'diversion' request and response,
      - iii. carrier authorized assignment of in-bond authority, and
      - iv. use of FIRMS codes for arrival locations.
    - c. We recognize that there are over 10,000 ACE Portal accounts in the Truck environment and recommend extension of that functionality to others such as CES, CFS, Warehouse, and FTZ who transact in-bond functionalities.
- 5. Messaging: We emphasize the essence of maintaining timely, actionable, and informative messages as PGAs begin operations in ACE.
  - a. Recommend the retention of the level of current functionality (such as that in production to include SNP, Special Bill, informational messages, and electronic 'holds').
  - b. We recommend the extension of current protocols to PGAs who are new to ACE, rather than the creation of any new protocols.
  - c. Concur with ITDS Committee GIFs supporting the above.
- 6. ACE M1:
  - a. Support, as noted below, the CBP IT platform migration from ACS to ACE:
    - i. Error-free transition and operating environment,
    - ii. No-sooner-than mid-2010 deployment,
    - iii. Tighter edits on data,
    - iv. Phased migration (no 'big bang'),
    - v. Technical specifications available at least 90 days in advance to allow for complete regression testing and programming as needed.
    - vi. Notification to SNP of cancellation of 1J in-bond authorization code "95."
- 7. House BL Release: The MMM endorsed the "House BL Release Task Group's" recommendation only to the extent that it does not affect existing Master BL release policy for ocean, rail, and MTO.
  - a. To such an extent as this is the case, the MMM supports the Task Group's recommendations to support 2-tier filing as follows;
    - Tier One:
      - i. Maintain Master BL functionality as currently in production at the VOC and MTO level of operations,
    - Tier Two:
      - i. Mandate electronic filing of House BL information by the bill-issuing NVOCC, and
      - ii. Provide an ACE Portal which will enfranchise important supply chain participants such as CFS/CES operators, bonded draymen, bonded warehouses, Foreign Trade Zones, and non-automated NVOCCs.